

**DRAFT REPORT: IMPACTS OF NATIVE VEGETATION
AND BIODIVERSITY REGULATIONS**

The submission is based on an understanding that the main purposes of this inquiry are

- to document and assess the impacts of existing native vegetation and biodiversity regulatory regimes on landholders and local communities, and the effectiveness of the regimes in reducing the costs of resource degradation; and
- to explore whether there are more efficient and effective ways of achieving desired environmental objectives.

Approach, data and assumptions

The document has heavily focussed on the assessment of the legislation without taking a broader and holistic approach to natural resource management. This perspective has limited its approach to finding more efficient and effective ways to achieving desired environmental outcomes. Options such as more education and extension and better information were mentioned but have not really been drawn together into an alternative approach to policy making on native vegetation and biodiversity management. Further development of other policy options would give direction to the community and agencies on more integrated and cooperative approaches.

The Commission states that it has a principle of "having an overarching concern for the community as a whole and not just the interests of any particular industry or group (P5-6)". However again the document has focussed on issues such as permit processes and length of assessment time which are only issues for a very small percentage of landholders (221 submissions from ?000's of landholders) and for a small percentage of the landscape (68% is okay). The other way to look at this data is that the legislation is achieving environmental objectives and has been effective in reducing large scale clearing and has been efficient in dealing with the process for many many landholders.

The issue of "potential in property income earning" is not offset by consideration of the potential of benefits from native vegetation and biodiversity retention. Nor does not it appear to consider the fact that all locations could not be equal in delivering "income earning potential".

Impacts (positive and negative) that native vegetation and biodiversity regulations have had on particular regions or communities.

Although the NSW Native Vegetation Conservation Act allows for regional vegetation committees to develop regional vegetation conservation management plans, the department support was patchy, data was limited, advice was inconsistent and the focus squarely on legislative means. Ideas developed at the committee level to deal with a regional issue were often overridden by the government desire to have a single approach across the state. This just compounds the regional community feeling that they are not consulted and remote/political decisions are being made with no reference to the local considerations. Other points that have affected any meaningful plan development were

- Limited or no assessment of the likely costs vs benefits
- Limited understanding of local ecosystem dynamics to assist in decision making
- Limited access to alternative options such as incentives, education, stewardship arrangements

- Impacts of the Threatened Species Conservation Act recovery plan processes on the regional vegetation management plans.

Expected regional impacts of the proposals to end broadscale clearing in NSW

The evidence in the Draft Report indicates that broadscale clearing in NSW has been significantly reduced under the current legislation. This appears to have occurred despite the regional vegetation management plan not being fully supported (as discussed above) to deliver regional clearing guidelines. The issues raised during the regional vegetation management plan process are again being dealt with for the new legislation and again blanket requirements are being developed remote from the rural and regional areas.

Again without a Risk Impact Statement with associated benefit cost assessment there will still be a lack of overall vision and clear objectives and outcomes. Benchmark mapping is still lacking for most of the state and meaningful decision making cannot be made at greater than the farm scale without broader vegetation data to ensure an holistic ecosystem approach.

Just legislation will not create the landscape vision that is required for conservation and protection of our ecological communities. The Landcare ethic and its already developed community foundation must be used to harness current drivers such as efficiency on farm, access to natural resources in the future, recognition of ecosystem services in markets and appropriate management as well as conservation incentives.

Research into “clearing constraints in estimating impacts”

There are numerous research areas that are required for native vegetation and biodiversity conservation. In particular local issues include:

- Effectiveness of incentives in conservation and regeneration
- Monitoring processes and analyses of the changes and “improvements”
- Ecosystem dynamics in the semi arid and arid areas
- Assessment of costs and benefits over the short, medium and long term of environmental options and use of offsets. Mapping and remote sensing
- Agriculture and the environment that make up a working landscape so that multiple perceptions can be met over the landscape not all of them at just one point in that landscape.
- Translation of catchment targets into practical onfarm actions and outcomes.
- Other options besides regulation to achieve environmental improvements such as
 - One stop shop education and information packages on natural resource management
 - Weed and feral animal management
 - Commercial use of native species